

**PSJ9 Exh 21**

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**From:** Samuels, Latoya <Latoya.Samuels@Andanet.com>  
**Sent:** Tuesday, March 18, 2014 3:27 PM  
**To:** Solis, Sabrina  
**Subject:** RE: Notes

Thank you! ☺

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**From:** Sabrina A Solis  
**Sent:** Tuesday, March 18, 2014 11:20 AM  
**To:** Latoya N Samuels  
**Subject:** Notes

- According to section 821 of the Controlled Substance Act, “The Attorney General is authorized to promulgate rules and regulations and to charge reasonable fees relating to the registration and control of the manufacture, distribution, and dispensing of controlled substances and to listed chemicals” (DEA, 2012). In other words, companies may be fined among other forms of punishment if the rules and regulations established by the Drug Enforcement Administration (DEA) are not adhered to. The reason that controlled substances are monitored is due to the fact that, “many of the narcotics, depressants, and stimulants that are manufactured for legitimate medical use are subject to abuse”(deadiversion.usdoj.gov-Inside Diversion Control, 2012). As a result, these drugs have been brought under legal control.
- “Under federal law, all businesses that import, export, manufacture, or distribute controlled substances; all health professionals licensed to dispense, administer, or prescribe them; and all pharmacies authorized to fill prescriptions must register with the DEA. Registrants must comply with regulatory requirements relating to drug security and recordkeeping” (DEA 2012).
- This term “Know Your Customer” is defined by the DEA in the following manner, “It is fundamental for sound operations that handlers take reasonable measures to identify their customers, understand the normal and expected transactions typically conducted by those customers, and, consequently, identify those transactions conducted by their customers that are suspicious in nature” (DEA, 2012).
- This is a part of a Suspicious Orders Monitoring system as defined by the DEA. “The DEA 21 CFR 1301.74 b mandate describes suspicious orders as having significant deviation in: Order Size (Quantity), Order Frequency, Order Pattern” (DEA, 2012).

- It feels like a bit of a blame game and finding blame with someone to get this whole epidemic under control. After all it can be debated that if there are drugs on the street that is at most fault? Is it the one who makes the drugs, sells the drug, prescribes the drug, or fills a prescription for the drug? We all play a very important role and that is why we are all responsible.

**Sabrina Solis**

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